

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MINHYE PARK,

Civil Docket No.: 1:25-cv-789

Plaintiffs,

-against-

JUDGES BARRINGTON D. PARKER, ALISON J. NATHAN, and SARAH A. L. MERRIAM of the United States Court of Appeals for the Second Circuit, in their individual capacities; JUDGE PAMELA K. CHEN and MAGISTRATE JUDGE LOIS BLOOM of the United States District Court for the Eastern District of New York, in their individual capacities; CATHERINE O'HAGAN WOLFE, in her official capacity as Clerk of the Second Circuit; DAVID COON and TERRENCE M. CONNORS, in their official capacities as members of the Committee on Admissions and Grievances; and OPENAI, INC.,

Defendants.

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**NOTICE OF MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in support, the attached proposed Second Amended Complaint with a redline comparison as required by Local Civil Rule 15.1, and all prior pleadings and proceedings herein, Plaintiff Minhye Park, by and through her undersigned counsel, will move this Court, before the Honorable Mark A. Barnett, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure granting Plaintiff leave to file the proposed Second Amended Complaint:

1. Granting Plaintiff leave to file the Second Amended Complaint in the form annexed hereto;
2. Deeming the proposed Second Amended Complaint filed and served as of the date of the Court's Order;

3. Awarding such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served upon the undersigned within fourteen (14) days after service of this motion.

Dated: April 15, 2025  
Uniondale, New York

JSLLAW OFFICE P.C.

/s/ Jae S. Lee

JAE S. LEE  
626 RXR PLAZA  
UNIONDALE, NY 11556